

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : NO. 17-16997
JOHN C. FLAGLER, :
Debtor : CHAPTER 7

**RESPONDENT'S ANSWER AND MOTION IN OPPOSITION TO DEBTOR'S
MOTION FOR CONTEMPT AND SANCTIONS FOR VIOLATION OF THE
AUTOMATIC STAY WITH ACCOMPANYING BRIEF BY RESPONDENT**

NOW COMES the Movant, **FRANCIS E. TEMPLIN** (the "Respondent"), and Respectfully moves this Court to Dismiss the instant motion in its entirety as frivolous and without merit; to *Sanction* and *reprimand* counsel for his indolence, lack of preparation and due diligence; and to pay the Respondent's research fees, costs and time incurred in preparing and responding to this Motion and the Accompanying Brief, and in support thereof, averred as follows:

That this Honorable Court has no jurisdiction in "Berks County Case No. 17-18659" and

1. Admitted and accepted as averred with no objection.
2. Admitted and accepted as averred with no objection.
3. Admitted and accepted as averred with no objection.
4. Admitted and accepted as averred with no objection.
5. Admitted and accepted as averred with no objection.
6. Admitted and accepted as averred with no objection.

7. **Objected** to in its entirety. The averment lacks specificity as to the "several actions" alleged to have been committed by Respondent. Respondent opines that the Court cannot make a determination or render a conclusion as to this averment. Strict proof is demanded.

FILED
2018 JAN 22 PM 1:43
U.S. BANKRUPTCY COURT
[Signature]

FRANCIS E. TEMPLIN

January 19, 2018

United States Bankruptcy Court
For the Eastern District of Pennsylvania
400 Washington Street
Suite 300
Reading, PA 19601

RE: John C. Flagler 17-16997

To the Court:

Relative to the Respondent's Motion docketed with the Court on January 18, 2018, please take note of an error in the captioning of said Motion. The word "Answer" was inadvertently left out of the caption.

Attached is a revised caption page that reflects the change. Unless an objection by an interested party is made, please docket this revised caption page with the Motion of January 18, 2018.

Thank you for your assistance,


Francis Templin

cc: Office of the U.S. Trustee
Paul Edward Trainor, Esq.

FILED
2018 JAN 22 PM 1:43
U.S. BANKRUPTCY COURT
